

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

HARRY WILLIAMSON,

Plaintiff,

vs.

LORAIN COUNTY, et al.,

Defendants.

CASE NO. 1:23-CV-01507

JUDGE DAVID A. RUIZ

DECLARATION OF STEPHEN M. BOSAK, JR.

I, Stephen M. Bosak, Jr., declare:

1. I am over 21 years of age, of sound mind, capable of executing this declaration, and have personal knowledge of the facts stated herein, and they are all true and correct.

2. I am a partner with the law firm of Gembala, McLaughlin, Pecora Co., LPA and am legal counsel for the Lorain County Board of Commissioners (the “Board”).

3. In the above-captioned case, I represented the Board and the individual Defendants, who were named in their official capacity as Board members or employees of the Board. This included Defendant Tom Williams, the former Lorain County Administrator.

4. On September 27, 2024, the Court granted summary judgment on behalf of all Defendants, except Mr. Williams. (Doc. 42). The evidence elicited at the summary judgment stage suggested that a potential conflict could arise in the future between my representation of both Mr. Williams and the Board and its members.

5. In October 2024, we advised Mr. Williams in writing of the potential conflict and suggested a search for new counsel. Mr. Williams approved our anticipated withdrawal. Later, in November, my law firm provided written notice to Board explaining the anticipated conflict and advising the Board of our intention to withdraw.

6. On December 5, 2024, William J. Novak entered an appearance on behalf of Defendant Tom Williams as lead counsel.

7. After my firm's withdrawal, William J. Novak will remain lead counsel and Mr. Williams's legal representation will not be adversely affected.

8. On August 8, 2025, I provided written notice to all remaining parties of my firm's intention to withdraw as counsel for Mr. Williams.

I declare under penalty of perjury that the foregoing is correct.

Signed this 11th of August 2025.

/s/ Stephen M. Bosak, Jr.
Stephen M. Bosak, Jr. (0092443)